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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-0666 PJH
)	
Plaintiff,)	STIPULATION and [proposed] ORDER
)	EXCLUDING TIME UNDER THE
v.)	SPEEDY TRIAL ACT
)	
PEDRO GRANADOS-VILLA, and)	
ROBERTO CARLOS ESTRELLA-)	
ARROYO,)	
)	
Defendants.)	

The United States and defendant ROBERTO CARLOS ESTRELLA-ARROYO, stipulate to exclusion of time under the Speedy Trial Act from November 1, 2006, to January 17, 2007, as follows:

1. The parties appeared before the District Court on the following dates and for the following purposes: November 1, 2006 (initial appearance); November 8 (trial setting); December 6 (trial setting); and December 13 (trial setting).

2. At each of these appearances, defendant ROBERTO CARLOS ESTRELLA-ARROYO, requested, the government agreed, and the Court approved, an exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), from that date until the date of the next

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1 scheduled appearance. In total, the time that the parties agreed to exclude was from November 1,
2 2006, to January 17, 2007. The grounds for exclusion were under 18 U.S.C. § 3161(h)(8)(A) &
3 (B)(iv). Failure to grant the requested exclusion of time would unreasonably deny defense
4 counsel and government counsel reasonable time necessary for effective preparation, taking into
5 account the exercise of due diligence. Furthermore, the parties agree that the ends of justice
6 served by excluding the period from November 1, 2006, to January 17, 2007, outweigh the best
7 interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(8)(A).

8 3. A proposed Order is submitted with this stipulation.

9 DATED: January 17, 2007

Respectfully submitted,

10 KEVIN V. RYAN
11 United States Attorney

12 /s/ Nathanael M. Cousins
13 NATHANAEL M. COUSINS
14 Special Assistant United States Attorney

15 /s/ Randy Knox
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 06-0666 PJH
)	
Plaintiff,)	[proposed] ORDER EXCLUDING TIME
)	UNDER SPEEDY TRIAL ACT
v.)	
)	
PEDRO GRANADOS-VILLA, and)	
ROBERTO CARLOS ESTRELLA-)	
ARROYO,)	
)	
Defendants.)	

Based upon the Stipulation of ROBERTO CARLOS ESTRELLA-ARROYO, and the United States, and for good cause shown, IT IS HEREBY ORDERED for defendant ROBERTO CARLOS ESTRELLA-ARROYO, only, that time under the Speedy Trial Act, 18 U.S.C. § 3161(c)(1), is excluded from November 1, 2006, to January 17, 2007, under 18 U.S.C. § 3161(h)(8)(A) & (B)(iv). The Court finds that the failure to grant this exclusion of time would unreasonably deny counsel for the defendant and the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court further finds that the ends of justice served by such action outweigh the best interest of the public and the defendant in a speedy trial.

DATED: 1/19/07

